

**REMARKS/ARGUMENTS**

Applicant and Applicant's counsel appreciate the Examiner's courtesy in granting the personal interview held April 17, 2009, and the Examiner's helpful further explanation of the Examiner's interpretation of the examined claims, and of the Examiner's position in the Office Action's application of the *Bianco* reference to the examined claims.

Applicant respectfully submits the above amendments to the form of claim 1, to provide more distinct claiming of subject matter Applicant regards as the claim 1 invention, and which Applicant submits as patentable over *Bianco* for at least the reasons Applicant hereby respectfully submits to the Examiner.

Further, to simplify issues claims 4 and 9 are canceled. The cancellations is unrelated to any outstanding rejection, and is not intended as any disclaimer of subject matter and does not prejudice Applicant's right to later pursue the subject matter of claims 4 or 9.

Applicant further and respectfully submits the above amendments do not add new matter. More particularly, the amended form of claim 1 recites:

defining at the authentication server a plurality of authentication modules available in said communication system

...

at least one of said authentication modules is a local authentication module executable on said authentication server, and at least one of said authentication modules is a remote authentication module, executable on a communication system node remote from said authentication server (emphasis added)

Claim 1, currently amended, at lines 5-11.

Applicant submits, as example support for the above-quoted form, paragraph [0011] of the specification, in particular the paragraph's recitation beginning at: "The present invention provides," and ending at: "the end user client." Applicant further submits the specification at paragraph [0018], in particular the paragraph's recitation beginning at: "Through the authentication stack," and ending at: "either remote authentication modules or local authentication modules"; and at the original claim 4.

Applicant also submits the specification's description of shortcomings in the prior art, and its description of Applicant's claim 1 invention providing solutions to such shortcomings. *See, e.g.*, paragraph [0010] of the specification.

Referring again to the amended form of claim 1, its language also includes: "mapping each of a plurality of authentication domain identifiers to a corresponding configuration of ... [the] authentication modules." *Id.*, at lines 12-14. Example support for this recital of mapping is at, for example, paragraphs [0018 and [0020] of the specification, as well as at the original claim 1.

Applicant's claim 1 further includes the client sending the authorization server one of the authentication identifiers, and the authentication server forming a stack based on that identifier, the stack comprising stack entries according to the authentication modules to which the identifier is mapped. *Id.*, at lines 17-19.

Applicant respectfully submits that example support for the above-identified claim 1 recital of forming a stack is at, for example, Applicant's Fig. 1,

blocks 20 and 21, as well as paragraph [0020] of the specification.

Applicant respectfully refers again to the amended form of claim 1, and submits that the language recites the authentication server, after forming the stack, initiating a distributed authentication process according to the stack. *Id.*, at lines 27-29.

Still further, the claim 1 recited initiation includes: determining whether each stack entry is a local or a remote authentication process and, for each stack entry that is a *local* authentication process, triggering an authentication process on the authentication server and, for each of the stack entries that is a *remote* authentication process, triggering a remote authentication process on a communication mode remote from the authentication server. *Id.*, at lines 30-42.

Applicant respectfully submits, as example support for this claim 1 initiating of a distributed authentication process, Applicant's Fig. 1, blocks 21, 22, 23, 24, 25 and 26; and paragraph [0028] of the specification. Applicant further submits various illustrative examples at paragraphs [0030] and [0031] of Applicant's specification.

As further described by Applicant's specification, among other features and benefits of the claim 1 invention, the above-recited initiating of an authentication process at the authentication processor provides for a distributed execution of the authentication by various nodes of the communication system. *See, e.g.*, paragraphs [0029], [0031] and [0032] of Applicant's specification.

The amended form of Applicant's claim 1 still further includes

consolidating results of said authentication process, including receiving a result of all local authentication processes and of all remote authentication processes triggered by said step of initiating an authentication process, and generating a consolidated result; and

determining an authentication status for the end-user client to be one of a successful authentication and a not successful authentication, based on said consolidated result (emphasis added)

Claim 1, currently amended, at lines 46-52.

Applicant respectfully submits, as example support for the above-quoted claim 1 language of initiating consolidating results, and of determining an authentication status, is found at, for example, Applicant's Fig. 1, blocks 30 and 31; and at paragraph [0028] of the specification, in particular the recitation beginning at: "Once all the stack entries have been processed," and ending at: "is failed."

Turning now to the Office Action, at pages 2-4 the Examiner recites a rejection of the examined claim 1, 4, 5, 6 and 9 under 35 U.S.C. § 103(a), alleging the claims are unpatentable over the collection of U.S. Patent No. 6,256,737 ("*Bianco*") and Riley, Data Abstraction and Structures Using C++ ("*Riley*").

Applicant respectfully traverses all of these rejections.

Applicant respectfully submits, first, that the combined teachings of *Bianco* and *Riley* lack the examined claim 1 and 9 authentication server forming a plurality of modules, as well as forming a stack of modules, and lacks an authentication service performed according to each of the modules.

Applicant submits that *Bianco* teaches authenticating a user by a server retrieving a list of biometric tests, and then the server controlling appropriate biometric devices to perform a conditional sequence of those biometric tests. *Bianco*'s conditional sequence proceeds by comparing at each step the test result against a parameter value from the user's stored biometric template, and then conditionally proceeding through the list, step-by-step until, and only until, a pass or fail condition is met. Applicant submits *Riley* adds nothing that remedies this shortcoming in *Bianco*.

Applicant submits, second, that the combined teachings of *Bianco* and *Riley* lack the examined claims' recitation of: "consolidating" the results of each of the authentication services, and of determining an authentication status based on the consolidated results. *Bianco* instead teaches a step-by-step process, the performance of each step contingent on the outcome of the prior step, at which the user's authentication status is not determined until the termination step is reached.

To expedite the present application, but without waiver of Applicant's traversal and without disclaimer of subject matter, Applicant respectfully submits the above-amended form of claim 1.

Applicant respectfully submits the amended form of claim 1 is clearly patentable over the collected teachings of *Bianco* and *Riley*.

Applicant submits the collection of *Bianco* and *Riley* lacks the claim 1 recital of:

defining ...a plurality of authentication modules ... wherein at least one of said authentication modules is a local authentication module executable on said authentication server, and at least one of said authentication modules is a remote authentication module, executable on a [remote] communication system node

Claim 1, currently amended, at lines 5-11.

*Bianco* teaches a server controlling biometric machines.

Applicant further submits the collection of *Bianco* and *Riley* clearly lack the amended claim 1 form of reciting the authentication server, after forming the stack, initiating a distributed authentication process according to the stack.

Claim 1, currently amended, at lines 27-29.

Applicant further and respectfully submits the collection of *Bianco* and *Riley* lack the claim 1 recital of: determining whether each stack entry is a local or a remote authentication process and, for each stack entry that is a *local* authentication process, triggering an authentication process on the authentication server and, for each of the stack entries that is a remote authentication process, triggering a remote authentication process on a communication mode remote from the authentication server. Claim 1, currently amended, at lines 30-42.

*Bianco* instead teaches a server controlling biometric machines by a step-by-step process, each step contingent on the outcome of the prior step, at which the user's authentication status is not determined until the termination step is reached.

Applicant further, and respectfully, submits the collection of *Bianco* and *Riley* lack the claim 1 recital of:

consolidating results of said authentication process, including receiving a result of all local authentication processes and of all remote authentication processes triggered by said step of initiating an authentication process, and generating a consolidated result; and

determining an authentication status for the end-user client to be one of a successful authentication and a not successful authentication, based on said consolidated result (emphasis added)

Claim 1, currently amended, at lines 46-52.

*Bianco* teaches, instead, determining a user's authentication status based on an escape or termination step.

Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claim 1 and of its dependent claims 5 and 6, for at least the reasons Applicant submits above,

#### CONCLUSION

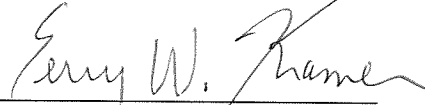
Applicant submits that all pending claims of this application stand in condition for allowance. Should the Examiner have any further comments or suggestions, though, Applicant respectfully requests that the Examiner telephone the undersigned attorney to expeditiously resolve any outstanding issues.

Application No: 10/699,665

Attorney's Docket No: ALC 3096

In the event the fees submitted prove insufficient in connection with the filing of this paper, please charge our Deposit Account Number 50-0578 and please credit any excess fees to such Deposit Account.

Respectfully submitted,  
**KRAMER & AMADO, P.C.**

A handwritten signature in cursive script, appearing to read "Terry W. Kramer", written over a horizontal line.

Terry W. Kramer

Registration No.: 41,541

Date: April 23, 2009

KRAMER & AMADO, P.C.  
1725 Duke Street, Suite 240  
Alexandria, VA 22314  
Phone: 703-519-9801  
Fax: 703-519-9802